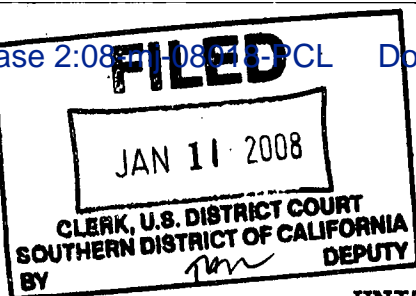


AUSA



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

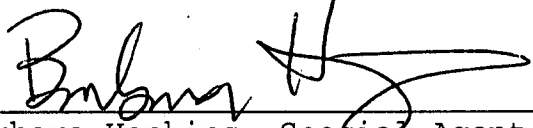
'08 MJ 8018

1	UNITED STATES OF AMERICA,)	Magistrate's Case No.:
2)	
3	Plaintiff,)	COMPLAINT FOR VIOLATION OF
4)	
5	v.)	Title 21 U.S.C. § 841(a)(1)
6)	Possession of a Controlled
7	Horaldo Flores)	Substance with Intent to
8)	Distribute
9)	
10	Defendant)	
11)	

12 The undersigned complainant duly sworn states:

13 That on or about January 2, 2008, within the Southern District
14 of California, defendant Horaldo FLORES did knowingly and
15 intentionally possess with intent to distribute approximately
16 1,738.68 kilograms (3,833.79 pounds) of marijuana, a Schedule I
17 Controlled Substance, in violation of Title 21 United States Code,
18 Section 841(a)(1).

19 And the complainant states that this complaint is based on
20 the attached Probable Cause Statement, which is incorporated
21 herein by reference.

22 
23 Barbara Hopkins, Special Agent
24 Drug Enforcement Administration

25 Sworn to before me and subscribed in my presence, January 11, 2008.

26 
27 Peter C. Lewis
28 UNITED STATES MAGISTRATE JUDGE

1 UNITED STATES OF AMERICA

v.

2 Horaldo Flores

3 PROBABLE CAUSE STATEMENT

4 This Statement of Facts is based on the reports, documents and
5 notes furnished to Drug Enforcement Administration Officer Barbara
6 Hopkins.

7 On January 2, 2008, at approximately 7:00 PM Drug Enforcement
8 Administration (DEA) agents, along with the Imperial County
9 Sheriff's Office and El Centro Police Department conducted a search
10 with the consent of Daniel FIGUEROA-Moreno of 1711 Lenrey Avenue,
11 El Centro, California. Upon searching the residence, agents located
12 approximately 3,833.79 pounds of marijuana in three of the four
13 bedrooms in the residence. In the closet of the bedroom that
14 contained personal property of Horaldo FLORES, agents discovered
15 approximately 25 bundles of marijuana. Personal property of FLORES'
16 was also located in the main bedroom and the dining room pf the
17 residence.
18

19 On January 2, 2008, DEA SA Jeff Butler and Imperial County
20 Sheriff's Office Deputy Camilo Gonzalez conducted an interview of
21 Daniel FIGUEROA-Moreno. FIGUEROA is a resident of the 1711 Lenrey
22 Avenue address. FIGUEROA stated that an individual in Mexico known
23 only as "E" contacted FIGUEROA and instructed him to locate a house
24 to rent for the purpose of storing marijuana. FIGUEROA stated that
25 E sent him \$1,300 for the rent at the 1711 Lenrey Avenue address. E
26 also sent FIGUEROA \$600 every two weeks as payment to FIGUEROA,
27 GUTIERREZ and Horaldo FLORES to watch over the marijuana and allow
28

access to the house for individuals moving marijuana into and out of the residence. Of the money, \$200 was given to FIGUEROA, \$200 was given to GUTIERREZ, and the remaining \$200 was given to FLORES. FIGUEROA also stated the last shipment of marijuana to the house was on December 20 or 21, 2007.

On January 2, 2008, DEA special agent Barbara Hopkins contacted the Imperial Irrigation District and discovered that utilities for the 1711 Lenrey Avenue address were under the name Horaldo FLORES with a Date of Birth of 09/05/1988.

On January 4, 2008, DEA special agent James Hughes contacted the property manager for the 1711 Lenrey Avenue address. The property manager provided the lease agreement which listed Christian GUTIERREZ, Horaldo FLORES, and Daniel FIGUEROA as tenants of the residence. The lease agreement was to begin on November 15, 2007.

On January 11, 2008, at approximately 10:30 AM, DEA Special Agent Barbara Hopkins, as witnessed by SAs Jim Hughes, Victor Vazquez, David Niebla and Michael Ortiz, arrested FLORES at his parents residence located at 2149 Orchard Road, Holtville, CA. DEA SAs Vazquez, Niebla and Ortiz brought TORRES to the Imperial County District Office (ICDO) and placed him in a temporary holding cell.